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## Memorandum

**To** Jeff Kimble On-Scene Coordinator U S EPA Emergency Response Branch Grosse Ile Michigan

**From** Stephen Wolfe START Project Manager I N & Associates Inc Medina, Ohio

**RE** Carter Coat assessment of MDEQ information

START Wolfe visited the MDEQ Detroit Field office and reviewed the site files provided by Pat Thornton on September 20 2007. START copied some files while there and requested copies of three documents specifically, (1) a Bid and Specifications Package that MDEQ used for clean-up bids (2) A Technical Memorandum for a site assessment performed in June 2004 and (3) an Asbestos Survey Report.

In the Bid Schedule MDEQ had 33 line items for contractors to bid of which 6 items will not be included here (i.e. site move, demo, submittals, etc.). After the bid line items are evaluated in this memo, an evaluation of the Waste Inventory will be presented.

START compared the reports with requirements for a CERCLA funded Removal Action.

In addition, MDEQ reported that the facility has been broken into sometime in the last few months, vandalized and a fire started.

### Bid Schedule Items

**Base Bid Item Numbers 5 thru 11** --- These line items are for asbestos containing material (ACM) either pipe wrapping (15,200 linear feet) or tiles, duct work, transite panels (88,000 square feet).

**Recommendation** ACM material in itself is generally not a CERCLA threat. ACM material will be removed when occasions warrant (i.e. necessary to remove wrapping to access liquid hazards, or material is friable and on the floor of the work areas endangering working safety).

**Base Bid Item Number 12** --- This Line item pertains to ACM material that has fallen apart and is on the floor of work areas and mixed with general debris.

**Recommendation** This material will have to be cleaned up and disposed of to ensure worker safety. A site walk through is necessary to estimate the amount of material to be disposed.

**Base Bid Item Number 13** --- This line item pertains to the removal and disposal of PCB containing fluorescent light ballasts.

**Recommendation** Further evaluate the ballasts to ensure that they do in fact contain PCBs. If the ballasts do contain PCBs, the documented vandalism activities would make

these ballasts an environmental threat due to breakage by the vandals and a health hazard to the trespassers

**Base Bid Item Number 14** – This line item pertains to the removal and disposal of fluorescent light tubes

**Recommendation** Fluorescent light tubes do not pose a CERCLA hazard

**Base Bid Item Number 15** – This line item pertains to the removal and disposal of mercury switches and gauges

**Recommendation** The mercury switches and gauges do not pose an environmental hazard by themselves however the documented vandalism cases at the site make these items an environmental hazard if the vandals would decide to break them throughout the building and in a worse case scenario if the vandals would take the switches/gauges home or to school then they would create a bigger problem. Removal of all mercury containing switches and gauges is recommended to eliminate this threat.

**Base Bid Item Number 16** – This line item pertains to the removal of acid batteries

**Recommendations** Acid batteries usually contain sulfuric acid and would have a pH of 1. This would meet the Characteristics of Corrosivity definition found in 40 CFR part 261.22. Removal of the batteries is recommended.

**Base Bid Item Number 17** – This line item pertains to the Demolition and disposal of SWMU #5

**Recommendation** Visually inspect the tanks associated with SWMU #5 and ensure that the tanks are empty and clean only. No demolition and disposal of the tanks would be warranted.

**Base Bid Item Number 18** – This line item pertains to the removal and disposal of PCB contaminated wood block flooring (~1 800 tons)

**Recommendations** No information can be found pertaining to the PCB contaminated wood blocks. The only reference available was in the health consultation report and it stated: In June 1996 MDEQ collected 5 samples from the wood flooring found high PAHs consistent with wood coated with creosote commonly used as a wood preservative and None of the wood samples contained any detectable PCBs. Further evaluation of the wood flooring is recommended prior to making any decisions on a removal.

**Base Bid Item Number 19** – This line item pertains to pressure washing of the floor and disposal of washwater (~90 000 square feet)

**Recommendations** Samples of the concrete flooring yielded results above the industrial direct contact clean-up criteria limits as defined in Public Act 451 Part 201 Generic Residential and Industrial Cleanup criteria. Specifically, PCBs were found in concentrations above 1 000 ug/kg (Industrial standard) with a maximum concentration of 11 000 ug/kg. In addition there were some SVOC sample results that exceeded the industrial contact standards. Pressure washing is recommended in areas that exceed the

limits therefore further evaluation of the locations of the contaminated areas is necessary

**Base Item Bid 20** – This line item pertains to Scarification of concrete and removal/disposal of concrete chips (~1 800 square feet)

**Recommendations** It is assumed that this refers to the areas where the high levels of PCBs and/or SVOCs were detected in the concrete. Further evaluation of the areas to determine if the contamination is removable (i.e. wipe sampling) should be conducted in these areas. If it shows that the contamination is removable Pressure washing may be the best alternative to remediate these areas

**Base Item Bid Numbers 21 thru 24** – These line items pertain to the excavation and disposal of soil listed as hazardous [100 tons] and non-hazardous [300 tons] and backfilling the areas

**Recommendations** None of the soil samples had contaminants that exceeded industrial contact levels except for the sediment sample of SWMU S3 (which had 1 SVOC exceedance). Since the removal recommendations are based on exceedances of residential standards no further action is required for the soils unless further evaluation yields other results

**Base Item Bid Number 25** – This line item pertains to the removal and disposal of liquid from SWMU 5 pits (~500 gallons)

**Recommendations** This is assumed to be container IDs 6, 7 and 8 as outlined in the waste inventory table (more information will follow). The material in these pits were analyzed and all failed TCLP analysis for lead and chromium (Waste Codes D007 and D008). Lead was as high as 660 mg/L and chromium was as high as 61 mg/L. These results meet the definition of Toxicity as defined in 40 CFR part 261.24. Removal of these wastes and cleaning of the pits is recommended

**Base Item Bid Number 25-1** – Removal and disposal of non-hazardous liquids (~2 000 gallons)

**Recommendations** No information is given pertaining to the location of the liquid. It is assumed that the 2 000 gallon is an estimate volume and the non-hazardous designation is from analytical results that were received on waste streams identified in the waste inventory log. Further evaluation of this item may be necessary

**Base Item Bid Number 26 thru 28** – These line items pertain to the removal and disposal of two USTs (assumed full at 1 000 gallons and 5 000 gallons) to include the excavated soil

**Recommendations** Further information is required on the contents of the USTs. The USTs can then be filled in with a flowable material instead of removed. Analytical results for the soil samples taken surrounding the USTs indicated that contaminants exceeded residential direct contact criteria but not Industrial direct contact criteria therefore no action on the soil is recommended at this time

**Base Item Bid Number 29** – This line item pertains to removal of general floor debris

**Recommendations** Evaluate (i.e. site walk through) the amount and location of the debris and determine whether it will interfere with site activities

**Base Item Bid Number 31** – This line item pertains to removal of overpacked drums and pails containing non-hazardous materials (14 total)

**Recommendations** Combine the material with other general non-hazardous debris and remove from site

**Base Line Item Number 32** – This line item pertains to the removal of empty drums, pails, vats and cylinders

**Recommendations** Combine the material with other general non-hazardous debris and remove from site

### **Waste Inventory Evaluation**

Twenty-nine separate waste streams were identified by an MDEQ contractor during a consolidation of all site wastes. The wastes were moved and combined into overpacked drums (when possible). Samples were collected and sent for waste characterization analysis which included RIC Analysis, TCLP metals, TCLP VOC's, and PCB analysis.

Two waste streams indicated characteristics of Corrosivity (D002): one 5-gallon pail of acidic solution and one 5-gallon pail of basic solution.

Five waste streams indicated characteristics of Ignitability (D001): one 5-gallon pail of basic solution, one 55-gallon drum of loose packed paint cans, one 55-gallon drum of aerosol cans, one 55-gallon drum of saturated sorbent material, and one 5-gallon pail of potassium permanganate.

Five waste streams indicated characteristics of Toxicity (D007 or D008): ~100 gallons of material from a pit, ~300 gallons of material from a tank, ~100 gallons of material from a pit, one 55-gallon drum of saturated sorbent material, one 55-gallon drum of loose packed containers of leak tracing dye.

Gear oil/lube spill on the floor contains 20 mg/kg PCB.

All other waste streams were determined to be non-hazardous by analytical results. In some cases MSDS information was available on pure products.

In addition there is approximately 75 RCRA empty drums, 2 RCRA empty totes and 6 empty Freon cylinders on site.

**Recommendations** Removal of these waste streams is warranted.